

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

<hr/>	:	Hon. Susan D. Wigenton
UNITED STATES OF AMERICA	:	
	:	Crim. No. 15-193 (SDW)
v.	:	
	:	<b><u>NOTICE OF MOTION</u></b>
WILLIAM E. BARONI, JR. and	:	
BRIDGET ANNE KELLY	:	
<hr/>	:	

To: Michael Baldassare, Esq.  
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75 Livingston Avenue  
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PLEASE TAKE NOTICE, that on November 3, 2016, or as soon thereafter as counsel may be heard, Paul J. Fishman, United States Attorney for the District of New Jersey (Lee M. Cortes, Jr., Vikas Khanna, and David W. Feder, Assistant United States Attorneys, appearing), will apply to this Court for an order to seal the Government's November 3, 2016 Letter to the Court.

In support of this motion, the Government respectfully refers the Court to the Declaration of AUSA David W. Feder, and requests that this motion be decided on the papers submitted, without oral argument.

PAUL J. FISHMAN  
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By: /s/ Lee M. Cortes, Jr.  
Lee M. Cortes, Jr.  
Assistant U.S. Attorney

By: /s/ Vikas Khanna  
Vikas Khanna  
Assistant U.S. Attorney

By: /s/ David W. Feder  
David W. Feder  
Assistant U.S. Attorney

Dated: Newark, New Jersey  
November 3, 2016